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a California general partnership

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

In re:

TOLLENAAR HOLSTEINS, a
California general partnership,

Debtor.

CASE NO. 15-20840-B-11

Chapter 11

DCN: FWP-3

Date:, February 6, 2015
Time: 3: 00 p.m.
Judge: Hon. Christopher D. Jaime
Courtroom: 32, Department B

**DECLARATION OF TAMI TOLLENAAR IN SUPPORT OF DEBTOR'S EMERGENCY
MOTION TO JOINTLY ADMINISTER CHAPTER 11 CASES**

I, Tami Tollenaar declare as follows:

1. My husband, Jon Tollenaar, and I are the general partners of Tollenaar Holsteins, the debtor and debtor in possession herein ("Tollenaar" or "Debtor") and the sole members of Friendly Pastures, LLC, an Oklahoma limited liability company, Case No. 15-20842 ("Friendly"), the sole member and manager of T Bar M Ranch, LLC, an Oklahoma limited liability company, Case No. 15-20844 ("TBM") (collectively, the "Debtors"). If called upon to testify as a witness in this case, I could and would testify competently as to the matters stated herein of my own personal knowledge and based on the business records of Tollenaar, Friendly and TBM regularly maintained in the ordinary course of their businesses.

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1 2. On February 4, 2015 (the "Petition Date"), the Debtors commenced their
2 respective reorganization cases by filing voluntary petitions for relief under Chapter 11 of the
3 Bankruptcy Code.

4 3. Tollenaar operates a dairy in Elk Grove, California. TBM operates a dairy in
5 Hendrix, Oklahoma and is an affiliate of Tollenaar. Friendly is an owner of TBM and an affiliate
6 of Tollenaar.

7 4. Tollenaar, TBM and Friendly share common ownership and creditors. Each of
8 these entities is operate by Jon and Tami Tollenaar, husband and wife, who are the sole owners of
9 the businesses. The Debtors are informed and believe that their largest creditors, Bank of the
10 West and Hartford Life and Accident Ins. Co. assert claims and liens against each entity, and
11 certain other creditors may assert claims against both Tollenaar and TBM

12 5. The cases are related cases in that they are affiliates as each case shares the same
13 direct or indirect ownership, common management, common creditors, and are otherwise so
14 related as to warrant being treated as related and for this reason the Debtors seek joint
15 administration only of the Debtors' cases.

16 6. Joint administration of the Debtors' cases is appropriate because the Debtors
17 intend to file with this Court numerous motions and applications. Joint administration, including
18 the combining of notices to creditors of the respective estates, as well as the notices and hearings
19 of all matters at the same time, will promote the economical, efficient and convenient
20 administration of the Debtors' estates. With three Debtors, each with its own case docket, the
21 failure to jointly administer these cases would result in duplicative pleadings repeatedly being
22 filed and served. Such duplication of substantially identical documents would be wasteful and
23 would unnecessarily burden the Court's clerks.

24 7. The rights of creditors of each of the Debtors will not be adversely affected by
25 joint administration of these cases. Joint administration will not affect substantive rights and
26 nothing set forth herein should be deemed to be a request for substantive consolidation of the

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Debtors' chapter 11 cases. To the extent that proofs of claim are required to be filed, each creditor will be entitled to file a claim against the particular estate that owes it money unless substantive consolidation is requested and granted. Finally, joint supervision of the administrative aspects of the chapter 11 cases by the Court and the Office of the United States Trustee will be simplified.

8. The Debtors further request that the official caption to be used by all parties and all pleadings in the jointly administered cases be as follows:

In re:
TOLLENAAR HOLSTEINS, a California
General Partnership, et al.,¹
Debtors-In-Possession.

CASE NO. 15-20840
Jointly Administered
Chapter 11

9. The Debtors submit that the use of a simplified caption, naming only Tollenaar Holsteins without specific reference to the other debtors, the states of incorporation, and the tax identification numbers will eliminate cumbersome and confusing procedures and ensure a uniformity of pleading identification.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration is executed on February 6, 2015, at Elk Grove, California.

/s/ Tami Tollenaar
TAMI TOLLENAAR

¹ The Debtors consist of the following entities: Tollenaar Holsteins, a California general partnership, Case No. 15-20840, Friendly Pastures, LLC, an Oklahoma limited liability company, Case No. 15-20842, and T Bar M Ranch, LLC, an Oklahoma limited liability company, Case No. 15-20844.